

Air Program Fact Sheet 1

Registration Permits

August 2007

WHAT IS A REGISTRATION PERMIT?

A Registration Permit is a new, standardized operation permit for use by facilities with low actual emissions.

WHAT ARE THE BENEFITS OF A REGISTRATION PERMIT?

- Flexibility to construct, modify, or replace equipment without obtaining a construction permit as long as the facility continues to comply with all conditions of the Registration Permit after the change.
- Less frequent and less prescriptive monitoring and recordkeeping requirements.
- Swift DNR permit issuance—15 days.
- Simplified permit applications and permitting process.
- Lower administrative costs—no construction permits, permit renewals, or revisions.

WHO CAN GET ONE?

- Facilities whose actual emissions are, and will continue to be, less than the permit thresholds. Table 1 contains the eligibility thresholds for Type A Registration Permits in Wisconsin.

Table 1: Type A Registration Permit Thresholds*

Pollutant	Actual Emissions
Particulate Matter or PM10	• 25 tons/year for attainment areas
Volatile Organic Compounds	• 25 tons/year for attainment and marginal or moderate nonattainment areas
Nitrogen Oxides	• 25 tons/year
Sulfur Dioxide	• 25 tons/year
Carbon Monoxide	• 25 tons/year for attainment and moderate nonattainment areas
Lead	• 0.5 tons/year
Section 112(b) Hazardous Air Pollutants	• 2.5 tons/year for any single pollutant • 6.25 tons/year for a combination of all pollutants

* The emission levels associated with 25% of major source threshold may change if an attainment area is designated as nonattainment or if a nonattainment area has its classification changed.

OTHER ELIGIBILITY CRITERIA:

- All stacks, except those for general building ventilation and certain emission units¹ must have vertical, unobstructed exhaust points.²
- All stacks, except those for insignificant emission units¹ must be at least as tall as surrounding buildings that have the potential to significantly reduce the dispersion of the emissions from the stack.³
- Regardless of stack configuration, facilities that emit 5 tons of particulate matter per year or more will need to undergo air quality modeling to ensure that the 24-hour standards for particulate matter can be met. DNR will perform this modeling for facilities that meet the above stack criteria for all their stacks.

- Pollution control devices at the facility must have control efficiencies equal to or greater than, the efficiencies in the Registration Permit.⁴
- Facility cannot be subject to any NSPS or MACT standards, other than those specifically listed in Table 4.
- Facility cannot be subject to any air pollution requirement that requires a case-by-case determination by the department, other than NR 424 latest available control techniques (LACT). Examples include NR 445 best available control technology (BACT) or lowest achievable emission rate (LAER).
- A facility's existing permits must be revocable by the department. For many businesses, this will be possible.

WHAT REQUIREMENTS ARE IN THE PERMIT?

- Facility emissions may not exceed the thresholds in Table 1.
- Annual recordkeeping of production/usage data necessary to calculate emissions.
- Operation and maintenance of all air pollution control devices and associated monitoring equipment.
- Recordkeeping requirements for pollution control device operating parameters.
- "Generic" LACT (s. NR 424.03(2)(c), Wis. Adm. Code) requirements.
- Must meet all other state (NR 400 – NR 499) and federal air pollution requirements that apply to the facility.
- Facility must submit annual compliance certification/monitoring report and report emissions to the air emission inventory (AEI) each year.

IS THERE A DOWNSIDE TO A REGISTRATION PERMIT?

Yes. The Registration Permit does not list the federal and state air pollution requirements that apply to a facility. It is up to the permitted facility to determine what these are. However, DNR will have tools available via its website and also hold workshops to help facilities determine what their applicable requirements are and how to comply with them.

NEXT STEPS

- Interested facilities that already have air permits should now use the Revocation Form to request that the DNR review their existing permits to ensure that the permits can be revoked.⁵ DNR will notify each facility if all of its permits can be revoked. If they cannot be revoked, the facility is not eligible for a Registration Permit and DNR will proceed with a traditional permit review. The Revocation Form is available at <http://dnr.wi.gov/air/permits/streamliningi/regpermits.html>
- Facilities may apply for a Registration Permit beginning in mid July or early August, 2006.
- DNR has 15 days to review each application and either grant or deny coverage or ask for more information.

¹ See Table 2 on page 3 for a list of emission units not subject to the stack requirements.

² As an alternative to this condition, a facility can model its emissions to demonstrate compliance with all air quality standards. Modeling results must be submitted with the hard copy of the Registration Permit application.

³ A building is considered to reduce the dispersion of emissions from a stack if the stack is located within a circle around the building, the radius of which is 5 times the height of the building.

- ⁴ See Table 3 on page 3 for a listing of the Registration Permit pollution control device efficiencies.
- ⁵ A list of DNR Air staff is available at: <http://dnr.wi.gov/air/about/amstaff.pdf>

Table 2: Insignificant Emission Units
Convenience space heating units with heat input capacity of less than 5 million BTU per hour that burn gaseous fuels, liquid fuels, or wood
Convenience water heating
Boiler, turbine, generator, heating and air conditioning maintenance
Demineralization and oxygen scavenging of water for boilers
Pollution control equipment maintenance
Fire control equipment
Office activities
Janitorial activities
Fuel oil storage tanks with a capacity of 10,000 gallons or less
Purging of natural gas lines
Maintenance of grounds, equipment and buildings, including lawn care, pest control, grinding, cutting, welding, painting, woodworking, general repairs and cleaning, but not including use of organic compounds as clean-up solvents
Internal combustion engines used for warehousing and material transport, forklifts and courier vehicles, front end loaders, graders and trucks, carts and maintenance trucks
Stockpiled contaminated soils
Any emission unit, operation, or activity that has, for each air contaminant, maximum controlled emissions that are less than the level specified in Table 3 of ch. NR 407, Wis. Adm. Code. Multiple emission units, operations, or activities that perform identical or similar functions shall be combined for the purpose of this determination
If the maximum controlled emissions of any air contaminant listed in Table 3 of ch. NR 407, Wis. Adm. Code, from all emission units, operations or activities at a facility are less than 5 times the level specified in Table 3, for those air contaminants, any emissions unit, operation, or activity that emits only those air contaminants

Table 3: Air Pollution Control Device Efficiencies						
	Control Efficiency (Total Enclosure)*					Control Efficiency (Hood)
Control Device	PM	PM10 and PHAP	VOC and VHAP	PM	PM10 and PHAP	VOC and VHAP
Low efficiency cyclone	40%	20%	—	32%	16%	—
Medium efficiency cyclone	60%	40%	—	48%	32%	—
High efficiency cyclone	80%	60%	—	64%	48%	—
Multiple cyclone w/out fly ash reinjection	80%	60%	—	64%	48%	—
Multiple cyclone with fly ash reinjection	50%	38%	—	40%	30%	—
Wet cyclone separator	50%	38%	—	40%	30%	—
HEPA and other wall filters (including paint overspray filters)	95%	95%	—	76%	76%	—
Fabric filters (e.g., baghouse, cartridge collectors)	98%	92%	—	78%	73%	—
Spray towers	80%	80%	70%	64%	64%	56%
Venturi scrubber	90%	85%	—	72%	68%	—

Condensation scrubber (packed bed)	90%	90%	—	72%	72%	—
Impingement plate scrubber	75%	75%	—	60%	60%	—
Electrostatic precipitators	95%	95%	—	76%	76%	—
Thermal oxidizers	—	—	95%	—	—	76%
Catalytic oxidizers	—	—	95%	—	—	76%
Condenser	—	—	70%	—	—	56%
Flaring or direct combustor	—	—	98%	—	—	78%
Biofiltration	—	—	80%	—	—	64%

* VHAP = Volatile hazardous air pollutant, PHAP = Particulate hazardous air pollutant

Table 4: Facilities subject to New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) standards, other than those listed below, are <u>NOT</u> eligible for a Registration Permit.
• Small Industrial-Commercial-Institutional Steam Generating Units (s. NR 440.207 Wis. Adm. Code)
• Storage Vessels for Petroleum Liquids for Which Construction Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (s. NR 440.27 Wis. Adm. Code)
• Storage Vessels for Petroleum Liquids for Which Construction Reconstruction or Modification Commenced After May 18, 1978 and Prior to July 23, 84 (s. NR 440.28, Wis. Adm. Code)
• Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels) for Which Construction Reconstruction or Modification Commenced After July 23, 1984 (s. NR 440.285 Wis. Adm. Code)
• Grain Elevators (s. NR 440.47 Wis. Adm. Code)
• Surface Coating of Metal Furniture (s. NR 440.48 Wis. Adm. Code)
• Industrial Surface Coating: Large Appliances (s. NR 440.57 Wis. Adm. Code)
• Petroleum Dry Cleaners (s. NR 440.68 Wis. Adm. Code)
• Industrial Surface Coating of Plastic Parts for Business Machines (s. NR 440.72 Wis. Adm. Code)
• Hot Mix Asphalt Facilities (s. NR 440.25 Wis. Adm. Code)
• Any New Source Performance Standard or Maximum Achievable Control Technology (MACT) Standard where the facility or process is subject to only the recordkeeping or notification requirements of that standard.

FOR MORE INFORMATION

• For more information on Registration Permits and to download this fact sheet, see:
<http://dnr.wi.gov/org/aw/air/apii/regpermits.html>

• Registration Permit Contact Person: Kristin Hart (608)273-5605, Kristin.Hart@wisconsin.gov

DISCLAIMER —This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

The Wisconsin Department of Natural Resources provides equal opportunity in employment, programs, services and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, DC 20240. This publication is available in alternative format (large print, Braille, audio tape, etc.) upon request. Please contact the Bureau of Air Management, phone 608-266-7718, for more information.

Wisconsin Department of Natural Resources
Bureau of Air Management
Box 7921- AM/7
Madison, WI 53707
PHONE 608-266-7718 • FAX 608-267-0560

PUB-AM-364 2005